

EXHIBIT 2

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA Electronic Mail Only

October 18, 2021

All Counsel for Merits and Jurisdictional Defendants
Per Attached Counsel List

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Counsel:

Accompanying this letter are two revised pages from the expert report of Evan Kohlmann consistent with his testimony on pages 436-439 and 729-31 and 734 of his August 5-6, 2021 deposition. Consistent with his testimony at pages 436-439 of his deposition, Mr. Kohlmann has revised page 23, paragraph 71 to remove the reference to Fayez Ahmad al-Shehri. In addition, Mr. Kohlmann has revised page 58, footnote 295 to reflect the corrected citation that he referenced during his deposition testimony (*see* 729: 10-16; 730:7-12; 730:25 to 731:16; 734: 12-16).

Sincerely,

COZEN O'CONNOR

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For the Plaintiffs' Exec. Committees

For the Plaintiffs' Exec. Committees

Merits and Jurisdictional Defendants

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Merits and Jurisdictional Defendants
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three bank accounts on behalf of the NGO between 1997 and 2001 and continued to have authorization to handle two of their accounts as a signatory on two the NGO's Bosnian accounts.”⁸²

68. U.S. government diplomatic cables have described the MWL's associations with international terrorist organizations and activities. For instance, an August 21, 2008 cable originating from the U.S. Embassy in Jakarta, Indonesia advises that Muhammad Thalib, “a commission member with the Muslim World League since 1989,” was selected as the supreme leader of the Majelis Mujahiddin Council (“MMI”), “the political wing of the terrorist organization Jemaah Islamiyah.”⁸³

69. A March 24, 2008 U.S. State Department diplomatic cable identifies the MWL and World Assembly of Muslim Youth (“WAMY”) as having ties to terrorist organizations.⁸⁴

70. A June 1, 2005 diplomatic cable from the U.S. Embassy in Madrid, Spain describes a joint investigation conducted by the Department of Justice and Spanish authorities linking the MWL to several million dollars in payments to accounts held by the Islamic Cultural Center in Madrid “between 1998 and 2003 that may have been diverted to persons suspected of supporting international jihadist activities.”⁸⁵

B. The International Islamic Relief Organization (IIRO)

71. The Jeddah-based charity International Islamic Relief Organization (IIRO) (Hay'at al-Ighatha al-Islamiyya al-'Alamiyya), known locally as “Ighatha,” “IGASA,” or “IGASE,” was founded in 1978 as a separate branch of the Muslim World League (MWL). Over the last thirty years, IIRO has become quite infamous for its often direct and inexplicable links to violent jihadists, including Al-Qaida and Usama Bin Laden.⁸⁶ Even Mohammed al-Zawahiri, leader of the Egyptian Islamic Jihad's military wing and the brother of Dr. Ayman al-Zawahiri (Bin Laden's personal physician and top advisor), worked and traveled around the world on behalf of IIRO.⁸⁷ U.S. government diplomatic cables have stated that “Usama bin Ladin used the entire IIRO network for his terrorist activities.”⁸⁸

72. According to U.S. Department of Defense documents, the U.S. government has privately designated IIRO as a “National Intelligence Priority Framework (NIPF) Counter-

⁸² https://www.treasury.gov/resource-center/terrorist-illicit-finance/Pages/protecting-charities_execorder_13224-a.aspx

⁸³ PEC-KSA 1444-1445.

⁸⁴ PEC-KSA 1446-1450.

⁸⁵ PEC-KSA 1791-1792.

⁸⁶ FED-PEC 220501-220502.

⁸⁷ “Official sources deny reports on UAE's extradition of Islamist.” Al-Hayat. June 7, 2000.

⁸⁸ FED-PEC 220501-220502.

of payments, confirm all revenues, and expenditures as recorded or verify the accuracy of its official donation receipts.”²⁹¹

192. The audit also determined that “WAMY (Saudi Arabia) maintains substantial control over WAMY’s finances, and uses this control to carry out its own objectives in Canada,” citing the following: “WAMY (Saudi Arabia) provides substantially all of WAMY’s operational funds;” “WAMY representatives advised the CRA during the audit that WAMY (Saudi Arabia) exercised a significant amount of control over their expenses;” and “WAMY provides annual reports to WAMY (Saudi Arabia) regarding the organizations that it funds and the amounts it disburses ... [because] WAMY (Saudi Arabia) wanted to know what it was responsible for supporting.” The Canadian government concluded that “[t]he audit findings did not reveal any apparent separation between the activities of WAMY (Saudi Arabia) and WAMY, with all related financial and operating positions being made by WAMY (Saudi Arabia).”²⁹²

193. Additionally, the Canadian government’s review of WAMY-Canada’s records revealed that “WAMY was closely associated with [Benevolence International Fund] BIF-Canada and provided funding to the Benevolence International Foundation (BIF-USA) in the United States. According to the audit: “BIF-Canada and WAMY shared a common director and contact information;” “BIF-Canada and WAMY shared a Canadian bank account” (“World Assembly of Muslim Youth o/a BIF”); and “WAMY provided funding to BIF-USA,” including a \$50,256 transfer to BIF-USA’s Orphan Program.”²⁹³

194. Finally, the investigation and audit discovered that WAMY-Canada has been distributing literature and other material produced by WAMY-Saudi Arabia which “in our view, appears to promote intolerance of, and/or advocate violence against, non-Muslims and/or the use of violence as a means to bring about political or societal change.”²⁹⁴

195. When 1993 World Trade Center bombing conspirator Ahmed Ajaj was arrested in New York, authorities seized an envelope from him containing Arabic-language terrorist training manuals. The envelope was marked with the letterhead of BIF, with a notation explaining that BIF is a branch of the “World Assembly of Muslim Youth.”²⁹⁵

196. From its inception, the Benevolence International Foundation (BIF) served as a means for pious, wealthy Muslims to secretly contribute to the jihad in Afghanistan. The Jeddah-based charitable group went to great lengths to protect the reputation of its prestigious donors. In 1993, Adel Batterjee publicly stepped down as head of BIF in exchange for a more behind-the-scenes role. Several years afterwards, the individual who took over Benevolence from Batterji, Enaam Arnaout (a.k.a. Abu Mahmoud Al-Hamawi),

²⁹¹ FED-PEC 218170-218203, at pp. 2-3.

²⁹² FED-PEC 218170-218203, at pp. 5-7.

²⁹³ FED-PEC 218170-218203 at pp. 12-14. See also WAMYSA 1745-1768, WAMYSA 1785, WAMYSA 1865-1872, WAMYSA 1885-1887, WAMYSA 1889, WAMYSA 4443.

²⁹⁴ FED-PEC 218170-218203, at pp. 17-18.

²⁹⁵ United States v. Salameh, et al. S(5) 93 Cr. 180 (KTD). United States District Court, Southern District of New York. Government Exhibit 2800-A.